

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)	
)	Case No. 3:19-bk-1971
CAPSTONE PEDIATRICS, PLLC,)	Chapter 11
)	Judge Mashburn
Debtor.)	

**EXPEDITED MOTION TO EXTEND TIME TO FILE SCHEDULES AND STATEMENT
OF FINANCIAL AFFAIRS**

Capstone Pediatrics, PLLC ("Debtor"), files this expedited motion ("Motion") pursuant to 11 U.S.C. § 365 and Rules 6004, 6006, & 9014 of the Federal Rules of Bankruptcy Procedures ("Bankruptcy Rules" or "Bankruptcy Rule"), for entry of an order granting an extension of time in which to file its Schedules and Statement of Financial Affairs. In support of this Motion, Debtor states as follows:

I. COMPLIANCE WITH LBR 9075-1

1. Expedited Relief Requested: That this Court enter an order granting Debtor's request to extend the deadline in which to file Debtor's schedules and statement of financial affairs.

2. Basis for Urgency: The 14-day time period specified in Rule 1007 of the Federal Rules of Bankruptcy Procedure and Interim Rule 1007-I for filing the Statements and Schedules expires on April 11, 2019. The current deadline does not provide Debtor with sufficient time to file a motion in the ordinary course.

3. Notice: This Motion has been served on: (i) all parties consenting to electronic service via the Court's CM/ECF system, (ii) the Office of the United States Trustee via email, (iii) the 20 largest unsecured creditors and all secured creditors via U.S. mail.

4. Suggested Hearing Date: The Debtor suggests that no hearing is necessary because no party will be prejudiced by the relief requested. Alternatively, the Debtor requests a hearing

date of April 9, 2019, at 9:00 a.m., in Courtroom 1, Customs House, 701 Broadway, Nashville, Tennessee 37203 or such other time that is convenient to the Court.

II. JURISDICTION

5. This Court has jurisdiction over this case pursuant 28 U.S.C. § 1334.

6. The subject matter of this Motion is a “core proceeding” pursuant to 28 U.S.C. §§ 157(b)(2)(A) and (M).

7. Venue is proper with this Court pursuant to 28 U.S.C. §§ 1408 and/or 1409.

III. FACTS

8. On March 28, 2019 (the “Petition Date”), the Debtor commenced this case by filing a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

9. The 14-day time period specified in Rule 1007 of the Federal Rules of Bankruptcy Procedure and Interim Rule 1007-I for filing the Statements and Schedules expires on April 11, 2019.

10. The Debtor is working diligently to assemble its financial information but will require additional time to complete the Statements and Schedules and ensure the accuracy thereof.

WHEREFORE, the Debtor respectfully requests, Order on an expedited basis, the entry of an extending the time for filing the Schedules and Statement of Financial Affairs until April 29, 2019, and for such other relief as the Court may deem just and proper.

Respectfully Submitted,

/s/ David W. Houston, IV
David W. Houston, IV (20802)
Emily C. Taube (019323)
BURR & FORMAN LLP
222 Second Avenue South, Suite 2000
Nashville, Tennessee 37201

Telephone: (615) 724-3215
Facsimile: (615) 724-3315
dhouston@burr.com
etaube@burr.com

Counsel for Debtor Capstone Pediatrics, PLLC

CERTIFICATE OF SERVICE

On April 5, 2019, the foregoing was served via CM/ECF on all parties consenting to electronic service in this case, and by regular mail, fax, or email (as applicable) to (i) the Debtor's twenty largest unsecured creditors, (ii) the Office of the United States Trustee, and (iii) all secured creditors.

/s David W. Houston, IV
David W. Houston, IV (020802)